

Statement on behalf of the Claimant
Witness: Tanya Mutch
2nd Statement
Dated: 2 June 2026
Exhibits: TMM8 - TMM11

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No. KB 2026-

IN THE MATTER OF SECTION 187B TOWN AND COUNTRY PLANNING ACT 1990

BETWEEN:

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

Applicant

and

TOM PRICE (1)

ASHLEIGH PRICE (2)

JACOB LEVY (3)

FRANCES O'DONOGHUE (4)

TRISTIAN SMITH (5)

MICHEAL FLYNN (6)

MARK COOPER (7)

WILLIAM DOHERTY (8)

DOUGLAS WARD (9)

WILLIAM FAULKNER (10)

MAISIE CLARKE (11)

MARY DOHERTY (12)

GERRY CONNORS (13)

DREWEY AMBROSE PRICE (14)

PERSONS UNKNOWN

(being persons who are entering, occupying, residing on, bringing caravans, mobile homes or other structures onto, or carrying out or intending to carry out works or development on, land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire, as shown edged red on the plan attached to this Order) (15)

WITNESS STATEMENT OF TANYA MUTCH

1. I, Tanya Mutch, Senior Planning Compliance Officer at South Cambridgeshire District Council ('the Council'), make this second witness statement in support of the Council's application for continuation of the injunction under section 187B of the Town and Country Planning Act 1990 in relation to land known as West of Moor Drove, Histon/Cottenham, Cambridgeshire ('the Site').
2. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of that information is identified. This statement should be read with my first witness statement. The exhibit numbering in this statement continues from that statement.
3. This statement deals with my further attendance at the Site on 2 June 2026 and the position I observed at that time. I also refer to the plot layout exhibited to the witness statement of Christopher Barnes as CB8. For ease of reference, I use the plot numbering shown on that layout throughout this statement.

ATTENDANCE ON 2 JUNE 2026

4. At approximately 08:00 on 2 June 2026, I attended the Site with officers from Cambridgeshire Police. The purpose of my attendance was to check the current position on the Site, to assess whether there had been any compliance with the injunction order, to serve further documents in advance of the return date hearing, and to speak to any persons present who were willing to engage.
5. The overall position was largely unchanged from my previous visit, save that Plot 6, which had previously contained long caravans which appeared habitable, had been cleared of caravans. A plastic structure remained on Plot 6, but the caravans had been removed.
6. Several of the older caravans which I have previously referred to as being among the original five caravans remained on the Site. In general, those older caravans were of a markedly different quality and condition from the newer, larger touring caravans and motorhomes on other plots. In my view, the five older caravans did not appear to be habitable and did not appear to be occupied.

SERVICE OF FURTHER DOCUMENTS

7. I served a document containing QR codes linking to the witness statements and documents filed by the Council for the return date hearing. A copy of that document is exhibited as TMM8.
8. I personally handed copies of the TMM8 document to Frances O'Donoghue, to a younger woman who I understood to be another Frances O'Donoghue, and to another younger female associated with Plot 13. I also affixed copies to fence posts on the fence line at Plot 3, Plot 6 and Plot 10. I did not affix copies at Plots 8, 11 or 13 because I had either served persons present in person or served persons associated with those plots.
9. Other than the individuals I refer to below, I did not see any other persons on the site and certainly nobody else on the Site came forward to speak to me or to provide their details.

PLOT BY PLOT OBSERVATIONS

10. Plot 1 was completely empty. It has always been empty during my attendances.
11. Plot 2 was empty. It has always been empty during my attendances.
12. Plot 3 contained one of the original five caravans. There was nothing else on the plot and no vehicles. I saw no signs of habitation. The caravan did not look lived in. The curtains were drawn so I could not see inside. I saw no power supply, gas supply or septic tank. Across three visits I have not seen anything to suggest occupation of this plot. The order served last week remained on the fence.
13. Plot 4 contained a very old, medium-sized caravan at the rear of the plot, which I understand to be one of the original five caravans. I could not see inside because the windows were blocked. I saw no sign of habitation, no personal effects and no cars. There was nothing else on the plot. It had been in the same condition since the previous Tuesday and this was the third visit on which I had seen it unchanged.
14. Plot 5 contained one of the original five caravans. It was an old touring caravan. There was a gas bottle outside it. There was foil on the inside of the main window and curtains drawn on the other windows. It did not have a built-in lock and appeared to be

secured only by a padlock on the outside. There was nothing else on the plot, no personal effects and no cars. The copy of the order that had previously been served at this plot had been removed.

15. Plot 6 was now empty of caravans. A plastic structure remained on the plot, but all caravans had been removed.

16. Plot 7 contained two caravans. One was old and appeared to be one of the original five caravans. The other was slightly newer. Both were medium-sized. There was nothing else on the plot and no cars. I have not spoken to anyone on this plot during my visits.

17. Plot 8 contained two larger touring caravans, one at each end of the plot to the left and right of the access into the plot. Astro turf had been laid outside the caravans. Both caravans appeared to be connected to a generator in the middle of the plot. At the rear of the plot I saw what appeared to be a newly deposited bund of earth, approximately 4 metres wide and 1 metre high. I could not see where the earth had been dug from, but it looked freshly dug. Photographs of Plot 8, including the bund, are exhibited as TMM9. Nobody was present on Plot 8 when I first attended, although I later spoke to the female, I believe to be Frances O'Donoghue (Junior) inside the motorhome in plot 11.

18. Plot 9 contained one of the original five caravans. It was very old, very small and did not look habitable. I saw no signs of life, no personal effects and nothing else on the plot.

19. Plot 10 remained unchanged in terms of the caravans present. It contained one large motorhome, one long touring caravan and what appeared to me to be a trailer-based toilet block. I saw no other cars on the plot. The plot looked occupied. The motorhome appeared new and the touring caravan appeared quite new. I had previously spoken to a gentleman at this plot who said he was only visiting. The copy of the order that I had previously served had been taken down.

20. Plot 11 contained a long motorhome. I had previously spoken to a lady associated with this plot. I now understand her to be Frances O'Donoghue because that is the name she gave to my colleague, Tony Wallis and that information is supported by information from the planning agent. On 2 June 2026, I spoke to younger women at Plot 11. One was a woman who had previously been on Plot 8 Who I believe is (Junior) Francis

O'Donoghue, and was now in the motorhome on Plot 11. Another was a young female from Plot 13 whom I had spoken to the previous Tuesday; she was also in the motorhome on Plot 11 with a young child aged approximately three. She told me that her mother was at the shops and would be coming back. I handed them the TMM8 bundle of documents, explained the injunction, explained that there was a breach of the injunction, and explained the potential outcomes of committal proceedings. They said that they would rather not provide their details.

21. There was another younger girl, who appeared to be approximately 16, inside the motorhome at Plot 11. I did not speak to her. Plot 11 also contained a long touring caravan. Nobody answered at the touring caravan. Both the motorhome and the tourer appeared to be connected to a generator. I could see an ainer with washing. Last week I saw a septic tank at the rear of the plot. On 2 June 2026 I saw a large amount of disturbed ground and could no longer see the septic tank. In my view, the likely explanation is that the septic tank had been installed below ground. Photographs of the disturbed ground at Plot 11 are exhibited as TMM10.

22. Plot 12 was empty and has not previously had anything on it during my visits.

23. Plot 13 had changed since my previous visit. The young female I had spoken to on Plot 11 returned to Plot 13 while I was there. Two caravans had been placed on the plot the previous Wednesday, after earlier movement of caravans on the plot. By 2 June 2026, a shed had been erected, astroturf had been laid at the front of both caravans, children's play items were on the astroturf and washing machines had been installed outside. At the back of the plot I could see the top of a plastic septic tank sticking out of the ground. Photographs of Plot 13, including the visible septic tank, are exhibited as TMM11. I do not recall seeing the septic tank before. However, from the drone images taken on 26 May 2026 I can see disturbed earth in that area. It is not visible on the 25 May 2026 images.

24. At Plot 13 I heard voices from electronic equipment or a television. I could not see electrical connections to a generator. However, I saw gas bottles and washing machines. I could not see whether the washing machines were plugged in or what they were plugged into. There were three vehicles on the plot: a Volvo XC60, which I think is the same Volvo with a 70 registration plate that I had seen previously; a small Fiat 500; and a small Citroen Caddy van.

25. As I was leaving the Site, I saw Frances O'Donoghue driving in. I met her just outside Plot 1. She was in a small white Caddy van with a large older male, aged approximately 60, who was driving. I had spoken to her before. I explained that there was still non-compliance with the order, served the TMM8 bundle on her, explained that she should attend court if she wished to make representations, and reiterated that the Court could impose serious sanctions.

26. Plot 14 had nothing on it and, during my visits, has not had anything on it.

SUMMARY AND CONCLUSION

27. In summary, the Site remained substantially occupied and set up for occupation on 2 June 2026. The only plot where caravans had been removed was Plot 6. Plots 8, 10, 11 and 13 contained caravans or motorhomes which appeared capable of occupation and were accompanied by indicators of residential use or preparation for residential use, including astroturf, generators, washing, children's play items, gas bottles, washing machines, a shed, toilet facilities and septic tank infrastructure.

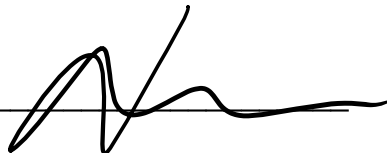
28. There also appeared to have been further works or changes since earlier visits, including the fresh-looking earth bund at Plot 8, the disturbed ground at Plot 11 where I had previously seen a septic tank, and the laying of astroturf and installation of a plastic septic tank at Plot 13.

29. Based on my observations on 2 June 2026, it remains my view that there is continuing non-compliance with the injunction order and continuing occupation or preparation for occupation of parts of the Site in breach of planning control.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: _____



Tanya Mutch

Dated: 2 June 2026

EXHIBIT LIST

Exhibit	Description
TMM8	Document served on 2 June 2026 containing QR codes linking to the Council's witness statements and documents for the return date hearing.
TMM9	Photographs of Plot 8, including the newly observed earth bund at the rear of the plot.
TMM10	Photographs of Plot 11, including disturbed ground where a septic tank had previously been visible.
TMM11	Photographs of Plot 13, including the visible plastic septic tank, shed, astroturf and other residential paraphernalia.
CB8	Plot layout exhibited to the witness statement of Christopher Barnes, used in this statement for plot numbering.



SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

v

TOM PRICE (1); ASHLEIGH PRICE (2); JACOB LEVY (3); FRANCES O'DONOGHUE (4); TRISTIAN SMITH (5); MICHEAL FLYNN (6); MARK COOPER (7); WILLIAM DOHERTY (8); DOUGLAS WARD (9); WILLIAM FAULKNER (10); MAISIE CLARKE (11); MARY DOHERTY (12); GERRY CONNORS (13); DREWEY AMBROSE PRICE (14); PERSONS UNKNOWN (being persons who are entering, occupying, residing on, bringing caravans, mobile homes or other structures onto, or carrying out or intending to carry out works or development on, land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire, as shown edged red on the plan attached to this Order) (15)

1 June 2026

On 24 May 2026 the Council secured an **interim injunction against PERSONS UNKNOWN** from the High Court under s187B of the Town and Country Planning Act 1990. The terms of the order are encapsulated in the enclosed sealed order.

Please take note of the penal notice on the interim order which makes clear that failure to comply with the order may render any person breaching this order liable to imprisonment or a fine.

The Council has now submitted a Claim with the court which Claim Form can be downloaded here:





The Council has also made an application to continue the interim injunction. The application and proposed draft order can be downloaded here:



The witness statement and exhibits in support of the Council's Injunction claim and applications can be downloaded here:

Stephen Kelly:



Cllr Cahn:



Witness statement of Chris Barnes:



Witness statement of Tanya Mutch:





A note of the injunction hearing of 24 May 2026 can be downloaded here:



Your attention is drawn to the penal notice on the order made on 24 May 2026 which makes clear that failure to comply may render you liable for imprisonment or a fine. Note that the application for continuation of the order against all the defendants similarly contains a penal notice and that, if the order is granted, failure to comply may render you liable for imprisonment or a fine.

Please note the return date of **3 June 2026 at 10:30am at The Royal Courts of Justice, Strand, London WC2A 2LL** at which time the Court will consider whether the Injunction Order should be continued, varied or discharged. You must attend this hearing.

You are advised to seek legal advice in relation to this order and the application for continuation of the injunction as soon as possible. If you fail to turn up at the 3 June 2026 hearing for the matter on the date and time of the listing, the court will be asked to proceed in your absence.

IN THE HIGH COURT OF JUSTICE

Claim No. []

KING'S BENCH DIVISION

IN THE MATTER OF SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990

BEFORE THE HONOURABLE MR JUSTICE MANSFIELD

DATED 24 MAY 2026



B E T W E E N : -

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

Claimant

and

PERSONS UNKNOWN

(being persons who are entering, occupying, residing on, bringing caravans, mobile homes or other structures onto, or carrying out or intending to carry out works or development on, land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire, as shown edged red on the plan attached to this Order)

Defendants

INJUNCTION ORDER

PENAL NOTICE

IF YOU, THE WITHIN NAMED DEFENDANTS, PERSONS UNKNOWN, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND LIABLE TO IMPRISONMENT OR FINED OR YOUR ASSETS SEIZED. ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT

1. This Order prohibits you from doing the acts set out in this Order. You should read the terms of the Order and these guidance notes very carefully. You are advised to consult a solicitor as soon as possible. You have a right to ask the Court to vary or discharge the Order.
2. If you disobey this Order you may be found guilty of contempt of court and may be sent to prison or fined, or your assets may be seized.

On 24 May 2026, The Honourable Mr. Justice Mansfield considered the application brought by South Cambridgeshire District Council ("the Claimant") for an injunction under section 187B of the Town and Country Planning Act 1990, supported by the witness statement listed in Schedule A and accepted the undertakings listed in Schedule B at the end of this Order.

UPON hearing Counsel for the Claimant, upon reading the witness statements listed in Schedule A and upon accepting the undertakings listed in Schedule B

AND UPON the Court being satisfied that the application has properly been made without notice to the Defendants having regard to the urgency of the matter, the risk of further development and occupation occurring before any noticed hearing, and the present inability to identify the persons with an interest in, or carrying out or intending to carry out works on, the Land

AND UPON the Court noting that the Claimant has been unable to obtain HM Land Registry title information for the Land before issue because the HM Land Registry online service was unavailable on the day of issue, as explained in the witness statement of Stephen Kelly

IT IS ORDERED THAT FROM ALTERNATIVE SERVICE BEING EFFECTED UNTIL 3 JUNE 2026 (THE RETURN DATE) OR FURTHER ORDER:

THE INJUNCTION

1. In relation to the land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire ("the Land"), as shown edged red on the attached plan, the Defendants, whether by themselves or by instructing, encouraging, permitting or assisting any other person, must not use the Land or carry out works to the Land in breach of planning control and, in particular, must not:
 - i. use the Land, or any part of it, for human habitation or residential occupation, including as a residential caravan site, or for any other purpose in breach of planning control;
 - ii. bring onto, station, site or place on the Land any touring caravan, static caravan, mobile home, park home, cabin, chalet or other structure for the purpose of human habitation or residential occupation or for any other purpose in breach of planning control;
 - iii. bring onto, erect, construct or install any buildings, day rooms, amenity buildings, utility buildings, portable toilets, containers, sheds, outbuildings, walls, gates, fences or other structures on the Land in association with human habitation, residential occupation, the stationing of caravans or mobile homes, or any other purpose in breach of planning control;
 - iv. bring onto the Land any portable structures, domestic equipment, domestic paraphernalia, storage items or other items associated with human habitation, residential occupation, or the creation of a residential caravan site in breach of planning control;

- v. bring onto, deposit, spread or store on the Land any further waste materials, hardcore, aggregate, road planings, building materials or like materials for any purpose including the creation, completion, extension or laying of hardstandings, hard surfaces, bases, pitches, tracks, parking areas, accessways, paths or roadways in association with the stationing of caravans or mobile homes, human habitation, residential occupation or any other purpose in breach of planning control;
 - vi. carry out any further engineering operations, excavation, levelling, grading, surfacing, drainage works, formation of accessways, paths, roadways or hardstanding, or any works associated with or in preparation for the use of the Land for the stationing of caravans and/or mobile homes or for human habitation or residential occupation in breach of planning control;
 - vii. install, connect, extend or alter any services or infrastructure on the Land, including foul drainage, septic tanks, cesspits, package treatment plants, soakaways, pipework, water, electricity, gas, heating, lighting, broadband, telecommunications or other utilities, where associated with or in preparation for human habitation, residential occupation, the stationing of caravans or mobile homes or any other purpose in breach of planning control;
 - viii. remove hedgerows, trees or vegetation, alter boundary treatment, or erect or complete any fencing, gates, walls, bunds or means of enclosure associated with the creation of residential pitches, a residential caravan site, the stationing of caravans or mobile homes, or any other purpose in breach of planning control;
 - ix. undertake any further development on the Land as defined by section 55 of the Town and Country Planning Act 1990 without the express grant of planning permission or otherwise in breach of planning control.
2. For the avoidance of doubt, this Order does not prohibit any lawful permitted development rights and/or the lawful agricultural use of the Land or the making of a planning application or other lawful application to the Claimant or to any other competent authority.

IT IS FURTHER ORDERED THAT

ALTERNATIVE SERVICE

3. Pursuant to CPR 6.15 and 6.27, permission for alternative service of this Order and related documentation is granted.
4. Service of this Order on all of the Defendants may be effected by the Claimant:
 - a. posting unsealed copies in transparent waterproof envelopes in prominent positions at or near the entrance to the Land and, where safe and practicable, on fencing, gates or other prominent features on or immediately adjoining the Land;
 - b. posting unsealed copies in transparent waterproof envelopes on any caravans, mobile homes, cabins, structures, vehicles, plant or equipment that may be found on the Land;
5. This shall be deemed to be good and sufficient service of this Order on all of the Defendants and the need for personal service of this Order is dispensed with in relation to all Defendants (for the purposes of CPR Part 81).
6. The Claimant shall also provide a QR code with the Order providing access to the Application Notice, evidence in support of the Application and future documentation.
7. The Claimant shall publish an unsealed copy of this Order on the Claimant's website;
8. Subject to further order, copies of any future documentation may be validly served on the Defendants in the ways specified above.

9. Should the Claimant become aware of the identity of any person currently encompassed within Persons Unknown, it shall apply, as soon as reasonably practicable thereafter, to join that individual to these proceedings.

10. Service in accordance with paragraph 4 above shall be deemed to be good and sufficient service on the Defendants of this Order, the Application Notice, the evidence in support of the application and any future documentation on the date on which the document is first affixed, posted or published by any of the methods set out in paragraph 4.

THE RETURN DATE

11. There shall be a hearing at 10.30am on 3 June 2026 (the Return Date) with a time estimate of 2 hours at the Royal Courts of Justice, Strand, London WC2A 2LL, or by such remote or hybrid means as the Court may direct. On the Return Date, the Defendants and any person affected by this Order may, if so advised, make representations in relation to the continuation, variation or discharge of this Order.

VARIATION OR DISCHARGE OF THIS ORDER

12. The Defendants, and any person notified of this Order or affected by it, may apply to the Court to vary or discharge this Order, or so much of it as affects that person, on 48 hours written notice to the Claimant's legal representatives. The hours between 5pm on any Friday and 9am on any Monday shall not be counted as part of the 48 hours' notice period.

13. Any person who wishes to be heard under paragraphs 5 or 6 should apply to the Court to be added as a named defendant to these proceedings and should provide their name, address and contact details in the application.

COSTS OF THE APPLICATION

14. Costs reserved.

15. Liberty to apply.

GUIDANCE NOTES

Effect of this Order - the Defendants

A Defendant who is ordered not to do something must not do it personally or in any other way. A Defendant must not do it through others acting on their behalf, on their instructions or with their encouragement, permission or assistance.

Effect of this Order - parties other than the Claimant and Defendants

It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized.

The grant of this Order does not prevent the Defendants or any person affected by it from raising any objection of law, practice, justice or convenience at the Return Date or any other hearing before the Court.

Interpretation of this Order

1. In this Order, "the Land" means the land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire shown edged red on the attached plan.
2. In this Order, references to "the Defendants" mean the Defendants identified as Persons Unknown and each of them.
3. A requirement to serve on "the Defendants" means service by the alternative service methods authorised by this Order. The Order is effective against any Defendant or person affected by it on whom it is served or who otherwise has knowledge of it.

4. The Defendants identified as Persons Unknown are adult persons who are not named defendants to this application who have an interest in the Land, who are entering or occupying the Land, who have carried out or intend to carry out works or development on the Land, or who intend to station caravans, mobile homes or other structures on the Land for human habitation or residential occupation or any other purpose in breach of planning control.
5. For the purposes of this Order, "development" has the meaning given by section 55 of the Town and Country Planning Act 1990.

Communications with the Court

All communications to the Court about this Order should be sent to the Royal Courts of Justice, Strand, London WC2A 2LL, quoting the claim number above. The offices are open between 10.00am and 4.30pm Monday to Friday except bank holidays.

SCHEDULE A

Evidence

The Judge read the following written evidence before making this Order:

1. First Witness Statement of Stephen Kelly dated 24 May 2026, together with exhibits SK/1 to SK/3.
2. First Witness Statement of Dr Martin Cahn dated 24 May 2026, together with exhibits MC/1 to MC/4.

SCHEDULE B

Undertakings given to the Court by the Claimant

1. As soon as reasonably practicable after the making of this Order, the Claimant will serve this Order, the evidence in support of the application, the skeleton argument for the hearing and a note of the hearing by the alternative methods authorised in this Order.
2. As soon as reasonably practicable after the making of this Order, the Claimant will publish on its website details of the injunction, the Order, the Return Date, a plan identifying the Land and copies of the application documents, subject to any necessary redaction of personal data.
3. The Claimant will place or affix copies of this Order and the related documentation at or near the entrance to the Land and in such other prominent positions on or adjacent to the Land as are safe and practicable.
4. The Claimant will make copies of this Order and the application documents available free of charge to any person affected by this Order who requests them from the Claimant or the Claimant's legal representatives.
5. The Claimant will file and serve evidence of service before the Return Date.
6. When the HM Land Registry online service is available, the Claimant will take reasonable steps to obtain title information for the Land and will consider whether any person thereby identified should be served directly and/or added as a named defendant to these proceedings.
7. As soon as practicable, the Claimant will file a claim form and serve the sealed claim form in this action claiming the appropriate relief.
8. As soon as practicable, the Claimant will serve a sealed copy of this order in accordance with the alternative methods authorised in this Order.

Name and address of Claimant's legal representatives:

Ivy Legal Limited
Office 2.05, Clockwise
Old Town Hall
30 Tweedy Road
Bromley
BR1 3FE
Email: enforcement@ivylegal.co.uk
Tel: 0203 7455 896

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
IN THE MATTER OF SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

DATED 24 MAY 2026

B E T W E E N : -

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

Claimant

-and-

PERSONS UNKNOWN

**(being persons entering, occupying, residing on, bringing caravans/mobile homes onto, or carrying out
or intending to carry out development on land known as West of Moor Drove, Histon/Cottenham,
Cambridgeshire)**

Defendants

INJUNCTION ORDER

Ivy Legal Limited
Office 2.05, Clockwise
Old Town Hall
30 Tweedy Road
Bromley
BR1 3FE

PLAN 1

The Land

[INSERT PLAN SHOWING THE LAND KNOWN AS "WEST OF MOOR DROVE" EDGED RED]

Plan



TMM9 photos of earth bund plot 8





TMM10 photos of disturbed land plot 11







TMM11 photos of disturbed land and top of septic tank plot 13



